

June 20, 2000

Alliance for Telecommunications Industry Solutions
Secretary, Industry Numbering Committee
1200 G Street, NW, Suite 500
Washington, DC 20005

Re: NANP Expansion Assumptions

Dear Sir or Madam:

This is in response to your correspondence of December 10, 1999 and April 15, 2000, in which you requested feedback on two assumptions regarding the North American Number Plan (NANP) expansion options. The assumptions, for which you seek confirmation, are: (1) implementation of mandatory 10-digit dialing for all calls prior to NANP expansion; and (2) affirmation that the "D" digit, the fourth digit in the current NANP, will not be released prior to the NANP expansion.

The North American Numbering Council (Council) recently provided the Common Carrier Bureau with a report and recommendation on the INC Expansion Assumptions. We applaud the Industry Numbering Committee (INC) efforts to examine and commence advance planning for future expansion of the NANP; however, we believe the issue of expansion of the existing NANP will require continued examination and analysis. Although the Council's report was instructive, we are unable to commit to specific assumptions at this time inasmuch as other expansion options, which do not depend upon the above two assumptions, may be more viable than the ones we would be limiting ourselves to based on these two assumptions.

We recognize that the INC is attempting to identify the most appropriate expansion plan, and poses these assumptions in order to refine the transitional dialing plan during NANP expansion. Accepting these assumptions at this juncture, however, may limit our consideration of other expansion options. We continue to believe that telecommunication technology advancements and innovation, which have been dramatic in recent years, will continue. Additionally, numbering optimization initiatives such as number pooling are expected to extend the life of the NANP. The Common Carrier Bureau believes that all options should be fully evaluated and suggests that the INC

Alliance for Telecommunications Industry Solutions
Industry Numbering Committee
Page 2.

continue to examine other options as they are presented over time. We regret that we are unable to provide any guidance to INC on the two assumptions presented in your recent correspondence.

Sincerely,

Yog R. Varma
Deputy Chief,
Common Carrier Bureau

cc: Chairman, North American Numbering Council